

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

ESTATE OF ABDOUL "MALICK" SILLAH,

Plaintiff,

Case No. 23-CV-96

v.

CITY OF MADISON, et al.,

Defendants.

**DEFENDANTS DANE COUNTY, EDIJRON PEARSON, AARON BARATZ,
JEFF MEEK, MARIE NOFODJI, NORBERT SCHAEZT, JOHN BAUMAN,
AMBER BROZEK, RYAN MOORAD, AND MELISA MENDOZA'S ANSWER
AND AFFIRMATIVE DEFENSES TO PLAINTIFF'S COMPLAINT**

NOW COME these answering defendants, Dane County, Edijron Pearson, Aaron Baratz, Jeff Meek, Marie Nofodji, Norbert Schaetz, John Bauman, Amber Brozek, Ryan Moorad, and Melisa Mendoza (unless noted otherwise, collectively “County Defendants” or “Defendants”), by their attorneys, Crivello Carlson, S.C., and as and for their Answer and Affirmative Defenses to Plaintiff’s Complaint, hereby admit, deny, allege, and show to the Court as follows:

1. Answering paragraph 1, not a factual allegation but instead a legal conclusion to which no response is required; to the extent a response is required, deny Plaintiff’s description as either complete or correct.
2. Answering paragraph 2, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

3. Answering paragraph 3, admit the jurisdiction of this court and admit venue is proper, but deny there was any violation of the Plaintiff's Constitutional Rights or violations of the law.

4. Answering paragraph 4, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

5. Answering paragraph 5, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

6. Answering paragraph 6, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

7. Answering paragraph 7, admit Dane County is a municipal entity in the State of Wisconsin and the employer of Edijron Pearson, Aaron Baratz, Jeff Meek, Marie Nofodji, Norbert Schaetz, John Bauman, Amber Brozek, Ryan Moorad, and Melisa Mendoza at all times relevant to the Complaint; as further to answer any remaining allegations, deny Plaintiff's description is either complete or correct and deny liability.

8. Answering paragraph 8, admit that John Bauman was the Dane County Juvenile Court Administrator for the JRC at all times relevant to the Complaint and that he acted in the course and scope of his office and authority, consistent with the United States Constitution.

9. Answering paragraph 9, admit that Edijron Pearson was the Dane County Juvenile Detention Superintendent at all times relevant to the Complaint and that

he acted in the course and scope of his office and authority, consistent with the United States Constitution.

10. Answering paragraph 10, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

11. Answering paragraph 11, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

12. Answering paragraph 12, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

13. Answering paragraph 13, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

14. Answering paragraph 14, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

15. Answering paragraph 15, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

16. Answering paragraph 16, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

17. Answering paragraph 17, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

18. Answering paragraph 18, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

19. Answering paragraph 19, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

20. Answering paragraph 20, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

21. Answering paragraph 21, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

22. Answering paragraph 22, admit that Amber Brozek was a Dane County Juvenile Court Counselor at all times relevant to the Complaint and that she acted in the course and scope of her office and authority, consistent with the United States Constitution.

23. Answering paragraph 23, admit that Norbert Schaetz was a Dane County Juvenile Court Counselor at all times relevant to the Complaint and that he acted in the course and scope of his office and authority, consistent with the United States Constitution.

24. Answering paragraph 24, admit that Marie Nofodji was a Dane County Juvenile Court Worker at all times relevant to the Complaint and that she acted in the course and scope of her office and authority, consistent with the United States Constitution.

25. Answering paragraph 25, admit that Ryan Moorad was a Dane County Juvenile Court Detention Worker at all times relevant to the Complaint and that he acted in the course and scope of his office and authority, consistent with the United States Constitution.

26. Answering paragraph 26, admit that Melisa Mendoza was a Dane County Juvenile Court Worker at all times relevant to the Complaint and that she acted in the course and scope of her office and authority, consistent with the United States Constitution.

27. Answering paragraph 27, admit that Jeff Meek was a Dane County Juvenile Court Detention Worker at all times relevant to the Complaint and that he acted in the course and scope of his office and authority, consistent with the United States Constitution.

28. Answering paragraph 28, deny the County and its agents have refused to identify him or produce records which would identify him, as to the remainder of the allegations lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

29. Answering paragraph 29, admit that Aaron Baratz was a Dane County employee at JRC at all times relevant to the Complaint and that he acted in the course and scope of his office and authority, consistent with the United States Constitution. Deny the County and its agents have refused to identify him or produce records which would identify him.

30. Answering paragraph 30, admit.

31. Answering paragraph 31, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

32. Answering paragraph 32, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

33. Answering paragraph 33, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

34. Answering paragraph 34, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

35. Answering paragraph 35, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

36. Answering paragraph 36, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

37. Answering paragraph 37, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

38. Answering paragraph 38, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

39. Answering paragraph 39, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

40. Answering paragraph 40, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

41. Answering paragraph 41, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

42. Answering paragraph 42, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

43. Answering paragraph 43, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

44. Answering paragraph 44, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

45. Answering paragraph 45, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

46. Answering paragraph 46, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

47. Answering paragraph 47, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

48. Answering paragraph 48, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

49. Answering paragraph 49, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

50. Answering paragraph 50, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

51. Answering paragraph 51, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

52. Answering paragraph 52, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

53. Answering paragraph 53, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

54. Answering paragraph 54, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

55. Answering paragraph 55, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

56. Answering paragraph 56, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

57. Answering paragraph 57, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

58. Answering paragraph 58, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

59. Answering paragraph 59, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

60. Answering paragraph 60, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

61. Answering paragraph 61, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

62. Answering paragraph 62, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

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66. Answering paragraph 66, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

67. Answering paragraph 67, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

68. Answering paragraph 68, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

69. Answering paragraph 69, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

70. Answering paragraph 70, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

71. Answering paragraph 71, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

72. Answering paragraph 72, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

73. Answering paragraph 73, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

74. Answering paragraph 74, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

75. Answering paragraph 75, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

76. Answering paragraph 76, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

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79. Answering paragraph 79, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

80. Answering paragraph 80, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

81. Answering paragraph 81, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

82. Answering paragraph 82, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

83. Answering paragraph 83, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

84. Answering paragraph 84, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

85. Answering paragraph 85, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

86. Answering paragraph 86, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

87. Answering paragraph 87, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

88. Answering paragraph 88, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

89. Answering paragraph 89, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

90. Answering paragraph 90, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

91. Answering paragraph 91, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

92. Answering paragraph 92, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

93. Answering paragraph 93, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

94. Answering paragraph 94, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

95. Answering paragraph 95, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

96. Answering paragraph 96, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

97. Answering paragraph 97, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

98. Answering paragraph 98, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

99. Answering paragraph 99, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

100. Answering paragraph 100, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

101. Answering paragraph 101, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

102. Answering paragraph 102, deny Plaintiff's description is either complete or correct.

103. Answering paragraph 103, deny Plaintiff's description is either complete or correct.

104. Answering paragraph 104, deny Plaintiff's description is either complete or correct.

105. Answering paragraph 105, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

106. Answering paragraph 106, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

107. Answering paragraph 107, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

108. Answering paragraph 108, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

109. Answering paragraph 109, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

110. Answering paragraph 110, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

111. Answering paragraph 111, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

112. Answering paragraph 112, deny Plaintiff's description is either complete or correct.

113. Answering paragraph 113, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

114. Answering paragraph 114, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

115. Answering paragraph 115, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

116. Answering paragraph 116, deny.

117. Answering paragraph 117, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

118. Answering paragraph 118, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

119. Answering paragraph 119, deny.

120. Answering paragraph 120, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

121. Answering paragraph 121, deny.

122. Answering paragraph 122, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

123. Answering paragraph 123, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

124. Answering paragraph 124, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

125. Answering paragraph 125, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

126. Answering paragraph 126, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

127. Answering paragraph 127, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

128. Answering paragraph 128, deny.

129. Answering paragraph 129, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

130. Answering paragraph 130, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

131. Answering paragraph 131, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

132. Answering paragraph 132, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

133. Answering paragraph 133, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

134. Answering paragraph 134, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

135. Answering paragraph 135, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

136. Answering paragraph 136, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

137. Answering paragraph 137, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

138. Answering paragraph 138, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

139. Answering paragraph 139, deny Plaintiff's description is either complete or correct.

140. Answering paragraph 140, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

141. Answering paragraph 141, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

142. Answering paragraph 142, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

143. Answering paragraph 143, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

144. Answering paragraph 144, deny.

145. Answering paragraph 145, deny.

146. Answering paragraph 146, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

147. Answering paragraph 147, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

148. Answering paragraph 148, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

149. Answering paragraph 149, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

150. Answering paragraph 150, deny.

151. Answering paragraph 151, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

152. Answering paragraph 152, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

153. Answering paragraph 153, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

154. Answering paragraph 154, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

155. Answering paragraph 155, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

156. Answering paragraph 156, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

157. Answering paragraph 157, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

158. Answering paragraph 158, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

159. Answering paragraph 159, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

160. Answering paragraph 160, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

161. Answering paragraph 161, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

162. Answering paragraph 162, deny Plaintiff's description is either complete or correct.

163. Answering paragraph 163, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

164. Answering paragraph 164, deny.

165. Answering paragraph 165, deny.

166. Answering paragraph 166, deny.

167. Answering paragraph 167, admit.

168. Answering paragraph 168, deny Plaintiff's description is either complete or correct.

169. Answering paragraph 169, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

170. Answering paragraph 170, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

171. Answering paragraph 171, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

172. Answering paragraph 172, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

173. Answering paragraph 173, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

174. Answering paragraph 174, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

175. Answering paragraph 175, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

176. Answering paragraph 176, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

177. Answering paragraph 177, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

178. Answering paragraph 178, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

179. Answering paragraph 179, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

180. Answering paragraph 180, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

181. Answering paragraph 181, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

182. Answering paragraph 182, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

183. Answering paragraph 183, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

184. Answering paragraph 184, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

185. Answering paragraph 185, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

186. Answering paragraph 186, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

187. Answering paragraph 187, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

188. Answering paragraph 188, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

189. Answering paragraph 189, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

190. Answering paragraph 190, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

191. Answering paragraph 191, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

192. Answering paragraph 192, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

193. Answering paragraph 193, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

194. Answering paragraph 194, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

195. Answering paragraph 195, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

196. Answering paragraph 196, deny Plaintiff's description is either complete or correct.

197. Answering paragraph 197, deny Plaintiff's description is either complete or correct.

198. Answering paragraph 198, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

199. Answering paragraph 199, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

200. Answering paragraph 200, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

201. Answering paragraph 201, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

202. Answering paragraph 202, deny Plaintiff's description is either complete or correct.

203. Answering paragraph 203, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

204. Answering paragraph 204, deny.

205. Answering paragraph 205, deny.

206. Answering paragraph 206, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

207. Answering paragraph 207, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

208. Answering paragraph 208, deny.

209. Answering paragraph 209, deny.

210. Answering paragraph 210, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

211. Answering paragraph 211, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

212. Answering paragraph 212, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

213. Answering paragraph 213, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

214. Answering paragraph 214, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

215. Answering paragraph 215, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

216. Answering paragraph 216, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

217. Answering paragraph 217, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

218. Answering paragraph 218, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

219. Answering paragraph 219, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

220. Answering paragraph 220, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

221. Answering paragraph 221, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

222. Answering paragraph 222, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

223. Answering paragraph 223, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

224. Answering paragraph 224, admit.

225. Answering paragraph 225, admit.

226. Answering paragraph 226, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

227. Answering paragraph 227, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

228. Answering paragraph 228, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

229. Answering paragraph 229, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

230. Answering paragraph 230, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

231. Answering paragraph 231, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

232. Answering paragraph 232, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

233. Answering paragraph 233, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

234. Answering paragraph 234, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

235. Answering paragraph 235, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

236. Answering paragraph 236, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

237. Answering paragraph 237, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

238. Answering paragraph 238, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

239. Answering paragraph 239, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

240. Answering paragraph 240, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

241. Answering paragraph 241, deny.

242. Answering paragraph 242, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

243. Answering paragraph 243, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

244. Answering paragraph 244, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

245. Answering paragraph 245, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

246. Answering paragraph 246, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

247. Answering paragraph 247, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

248. Answering paragraph 248, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

249. Answering paragraph 249, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

250. Answering paragraph 250, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

251. Answering paragraph 251, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

252. Answering paragraph 252, deny.

253. Answering paragraph 253, deny.

254. Answering paragraph 254, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

255. Answering paragraph 255, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

256. Answering paragraph 256, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

257. Answering paragraph 257, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

258. Answering paragraph 258, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

259. Answering paragraph 259, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

260. Answering paragraph 260, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

261. Answering paragraph 261, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

262. Answering paragraph 262, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

263. Answering paragraph 263, lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

264. Answering paragraph 264, deny the drug overdose occurred in JRC, as to the remainder of the allegations lack information sufficient to form a belief as to the truth of these allegations; therefore, deny them and put the Plaintiff to its proof.

265. Answering paragraph 265, deny.

266. Answering paragraph 266, deny.

267. Answering paragraph 267, deny.

268. Answering paragraph 268, not a factual allegation but instead a legal conclusion to which no response is required; to the extent a response is required, deny Plaintiff's description as either complete or correct.

AFFIRMATIVE DEFENSES

As and for affirmative defenses to Plaintiff's Complaint, these answering Defendants submit the following:

- a. the injuries and damages sustained by Plaintiff, if any, were caused in whole or in part by the acts or omissions of the Plaintiff and the failure to mitigate;
- b. the injuries and damages sustained by the Plaintiff, if any, were caused in whole or in part by the acts or omissions of persons other than these answering defendants;
- c. the Complaint contains claims that fail to state a claim upon which relief may be granted as against these answering defendants;
- d. these answering Defendants are immune from suit under common law and statutory immunities and privileges;

- e. these answering Defendants are protected from suit by immunities including qualified immunity;
- f. Plaintiff failed to state a claim for and is not legally entitled to equitable relief;
- g. any and all injuries or damages sustained by the Plaintiff are the result of an intervening and/or superseding cause preventing Plaintiff a right of recovery against these defendants;
- h. Plaintiff may have failed to exhaust administrative remedies before pursuing this action;
- i. Plaintiff may have failed to name necessary and indispensable parties;
- j. to the extent Plaintiff is bringing a state law claim, the claims are subject to the limitations, requirements, caps and immunities in Wis. Stat. § 893.80;
- k. the Plaintiff's claim for punitive damages is contrary to Wisconsin law and the Constitution;
- l. at all times relevant to matters alleged in Plaintiff's Complaint, the defendants acted in good faith in accordance with established laws and administrative rules;
- m. all or portions of Plaintiff's Complaint must be dismissed pursuant to the doctrine of discretionary immunity; and
- n. no individual defendant can be found liable for the actions of any other individual defendant(s) under a theory of respondeat superior, or supervisory liability;
- o. Defendants reserve the right to name additional affirmative defenses, as they may become known through further discovery or otherwise in this action.

WHEREFORE, the County Defendants, demand judgment dismissing the Plaintiff's Complaint on the merits and with prejudice, together with all costs,

disbursements, attorney fees and such other relief as the Court may deem appropriate.

THE DEFENDANTS DEMAND A JURY TRIAL

Dated this 1st day of May, 2023.

CRIVELLO CARLSON, S.C.
Attorneys for County Defendants

BY: *s/Kiley B. Zellner*

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